

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**NEW YORK HEALTHCARE
INSURANCE COMPANY, A RISK
RETENTION GROUP,**

Plaintiff,

v.

No. 1:16-cv-10609

**OAK LAWN RESPIRATORY AND
REHABILITATION CENTER, LLC, an
Illinois Limited Liability Company and
HENRY MOORE, as Independent
Administrator of the Estate of WILLIAM
MOORE, Deceased,**

Defendants.

PLAINTIFF'S CROSS-MOTION FOR JUDGMENT ON THE PLEADINGS

Now comes the Plaintiff, New York Healthcare Insurance Company, a Risk Retention Group, by its attorneys, Pretzel & Stouffer, Chartered, and pursuant to Federal Rule of Civil Procedure 12(c) for Judgment on the Pleadings, moves this Honorable Court to enter Judgment in its favor and against Defendant Oak Lawn Respiratory and Rehabilitation Center, LLC. In support hereof, the Plaintiff submits its Memorandum of law.

Respectfully submitted:

s/ Jonathan L. Federman

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